

Western District  
of Wisconsin

Brandon D Bradley Sr  
Plaintiff

(Verified complaint)

VS

Sheriff Barrett

T.J. Barth

Dep Sheriff

Dep Doe #1-2

Dep Does 1-20

Dr Syed

Nurse Anita (Doe)

Nurse Joseph (Doe)

Trisha (Doe)

Jurisdiction and  
Venue: (Supplemental)

Pursuant to 28 U.S.C. § 1367, 42 U.S.C. § 1331 (1), 1343, and 1391 (b) ~~and~~ this court is granted supplemental jurisdiction to hear both state and federal claims

SB (a)

①

SB (a)

1. At all relevant times I Brandon D Bradley was an inmate at Dane Co Jail in Madison Wisconsin

2. On 6-1-21 Sheriff Kalvin Barretts dept illegally without probable cause and legal jurisdiction executed a warrant that was filed on 5-31-19 in case # 19-cf-1343 over 2 years without me being taken to 1A court I was falsely imprisoned at his jail from 6-1-21 until 10-6-21

3. On or about 9-17-21 Dep TJ Barth informed me that she was going to be off for a while Me and Barth were very close. That upset me and before she left I told her I was going to kill myself

4. I began chewing a pencil in front of Barth and Dep John Doe and told them that I wanted to go on suicide watch. At no time did she or dep John Doe send me to the hospital for medical treatment

② SB(a)

⑤ She asked me what was wrong, I said I want to go on suicide watch. On my person I had concealed

- torn bed sheet
- toothette handle
- piece of metal

⑥ She then radio'd for MH worker Trisha. Trisha arrived to my cell 623 D and said what's wrong. I told her to put me on obs. She said are you sure, you got trial in 3 days. I said yes I'm sure and then began wrapping the torn sheet around my neck until the point of nearly passing out.

⑦ She said can you stop that, that looks pretty tight. I unwrapped it from around my neck, and she said can I have it please. I said ok and slid the sheet under the door. I said what about the pencil I swallowed. She said I'll tell the nurse. She said do you have anything else to hurt yourself with. I said I might. She said if you feel like hurting yourself you will tell staff right. I said yes. She placed me on suicide watch.

③

SB (a)

⑧ Second shift started and around dinner time (5pm) I showed Dep Shotliff the toothette handle, and said watch this and inserted it in my rectum. A toothette is a sponge tooth wipe w/ a hard paper handle sort of like a lollipop handle

⑨ He walked off and did not notify a supervisor (Shotliff)

⑩ After getting my dinner tray, and Shotliff walked off on me, Shotliff and dep John Doe came to retrieve my tray

⑪ I said why did you not get a supervisor, he said Bradley can I get your tray. I then unwrapped the torn sheet wrapped around my testicles, and began to tie off to the side of the door

⑫ I then began hanging myself, and Shotliff radio'd for available staff and nurses

⑬ For 5 mins I wrestled to continue to hang myself, and on multiple occasions I almost passed out. Shotliff screamed somebody

④

SB(a)

hurry up and get the fucking scissors he's killing himself

⑭ At no time did he or dept does I-10 utilize their training on how to deal with inmate who is hanging himself in violation of D.C.S.O. policy 610.04 (emergency medical care) 613.03 (suicide attempt intervention)

⑮ Dep Does I-10 and Shotliff put me in the restraint chair with the toothette handle still inserted in my rectum. The toothette handle is a inch with and around 5 inches long It was fully inserted in my rectum

⑯ While doing a restraint check I informed Nurse Joseph and Anita that I had inserted. At no time did, Anita, Joseph, Shotliff, or does I-10 send me to the hospital in violation of D.C.S.O. policies 610.04 or 613.03 (see par # 14)

⑤

SB(a)

## Count II

⑪ On or about 9-20-21 I scratched my camera lens w/ metal while I was on suicide watch. The observation placement as outlined in this par originally started on 9-17-21. Plaintiff incorporates par # 3, 4, 5, 6, 7 into par 17 alleges and realleges the following.

⑫ ~~was~~ moved from 623 D to 623 A. I then scratched ~~that~~ camera lens, and began cutting my wrist. From 9-20-21 until 9-30-21 I cut myself in front of Dep Shotliff and Dep Does 1-10. At no time did they order me to stop, spray me to stop me from self harming, or send me to the hospital for medical attention.

⑬ The cut was 2 inches long and 3 inches deep on my left forearm.

⑭ On or about 9-24 after receiving dinner I inserted a rubber spoon in my rectum. Dep Shotliff, his partner dep doe, and does 1-6 tethered me to the door and waited for a supervisor.

⑥

SB(a)

②① Sgt Moore after having a team meeting with Shotliff, dep doe and does 1-6 instructed them to place me in the restraint chair. I begged them not to put me on go pro camera, and they did it anyway. (set me in the chair with a spoon inserted in rectum)

②② They left me in the chair after Nurse Taylor did her restraint for around 4 hours. During which time I could hear Nurse Taylor and Does 1-10 laughing saying who wants to go get the spoon.

②③ To protest how I was being treated inmate Quentrell Williams went on obs 623E and inmate Dustin Lapuma threatened to go on suicide watch but I pleaded with him not to.

②④ As a result of the self harming from 9-17-21 until 9-30-21 I sustained a 2in wide 3in deep cut, rectal bleeding, severe stomach pain, and cramps

⑦

25. As punishment for engaging in self harm classification's Karianne Kunder t ordered Nurse Bobbi to put me on finger food from around 9-20-21 until 10-6-21. The spoon stay ed in my rectum from around 9-24-21 until 9-28-21

26. Dr Syed is the primary doctor at Dane Co Jail. He was aware that I had inserted a spoon, and asked if he could remove it. I said no, that I knew him from the WI D.O.C. and I did not trust his judgment, and wanted to go to the hospital for a independent evaluation. At no time did he utilize his training and experience to send me to the hospital for medical attention.

27. As Supervisor of Dane Co Jail, Barrett is responsible for the actions of his employees named in par 1-26. Barrett has created a culture at the jail, allowing dep sheriffs to make medical decisions, and interfere with medical care professionals judgment. His systemic practices as alleged in par 1-26 endangered not only the health and safety of plaintiff, but inmates who will be housed at Dane Co Jail in the future

⑧

Barrett's practices not only violate State and federal constitutional rights, but subject myself and future inmates similarly situated in my position the threat of irreparable harm or death

28. On 10-6-21 I was admitted to the WI D.O.C. Immediately upon my admission, I attempted to seek medical attention via ICI's, Sick Call Slips, and being medically evaluated, and I still have not been hospitalized or receive adequate medical care.

29. I continue to suffer from severe stomach pain, cramps, and bloody stools. I suffer the risk of death, irreversible harm, internal injuries unless I receive immediate medical attention

30. Plaintiff has 3 or more strikes and requests imminent danger IFP

\* Gilbert - Mitchell v Lappin 2008 WL 4545343 (S.D. ILL Oct 10, 2003) allegation that discontinuation of psychotropic medication caused plaintiff to injure himself could mean that was imminent danger of self injury without them

⑨

31. As of today the conviction Im imprisoned for (19-cf-1343) is illegal, and in violation of WI Stat. Plaintiff has invoked his right to counsel, and filed a motion for Hon John Hyland to ~~substitute~~ himself off of the criminal proceedings.

32. Plaintiff incorporates, ~~alleges and recites~~ par #1 and ~~states~~ that from 6-1-21 until 4-26-22 Barretts Sheriff dept has falsely imprisoned, or participated in a conspiracy with the WI D.O.C. to continue to falsely imprison me to hinder plaintiff from raising funds to pay my filing fees out of D.O.C. custody where Im subjected to the PLRA and the 3 strike provision.

Claims:

Barrett, Barth, Shotliff, Does 1-2, Does 1-20, Syed, Anita, Joseph, Trisha violated plaintiffs 14th amendment right to be free from cruel and unusual punishment, to receive adequate medical care as alleged in par 1-32 depriving plaintiff of life, liberty, and property (14th amendment due process)

(10)

Barrett, Barth, Shotliff, Doe 1-2, Dep Does 1-20, Syed, Anita, Joseph, Trisha violated plaintiff's right to be treated equally: to inmates similarly situated ~~under the same~~ 66 Sheriff Barrett and the D.C.S.O. whom engaged in self harm as alleged in par 1-32, ~~depriving plaintiff of his 14th amendment equal~~ protection rights depriving plaintiff of life liberty and property

Plaintiff alleges, realleges, and incorporates par 1-32 and states that Barrett violated plaintiff's 4th amendment right to be free from illegal search and seizure causing injury

Plaintiff alleges, realleges, and incorporates par 1-32 and states that Barrett's systemic practices as outlined in par 1-32 violated plaintiff's 14th amendment right to be free from a system that denies plaintiff(s) to adequate health care, treatment of inmates equally, to not be subjected to cruel and unusual punishment depriving plaintiff of life, liberty and property

⑪

Trisha, Anita, Joseph, Syed violated plaintiffs right to be free from medical malpractice violating state tort law as outlined in par 1-3a

Barrett vi

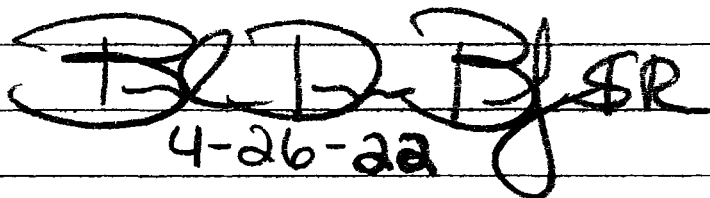
Barrett violated plaintiffs right to be free from false imprisonment as alleged in par 1-3a causing injury

Relief:

- permanent injunction
- t.r.o.
- \$250,000 monetary damages (state)
- \$250,000 monetary damages (federal)
- body cams on all D.C.S.O. inmates

Verification:

Pursuant to 28 U.S.C. §  
1746 I declare under penalty  
of perjury the foregoing is  
true and correct

  
4-26-22